

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

IN RE: PHARMACEUTICAL INDUSTRY
AVERAGE WHOLESALE PRICE LITIGATION

MDL No. 1456

Civil Action: 01-CV-12257-PBS

THIS DOCUMENT RELATES TO:
ALL ACTIONS

Judge Patti B. Saris

**MOTION TO FILE DECLARATION AND
UNREDACTED EXHIBITS UNDER SEAL**

The undersigned respectfully moves the Court for leave to file under seal the Declaration of Kent M. Williams and unredacted Exhibits A-J thereto, submitted in support of the motion by Kline & Specter, P.C., Williams Law Firm, and Jennings Haug & Cunningham, LLP (collectively, "Movants") for modification of Lead Counsel's allocation of fees to include Movants' time and expense incurred in related state court actions in New Jersey and Arizona, and to impound said declaration and unredacted exhibits until further order by this Court. Portions of some exhibits to the Williams Declaration may tend to reveal attorney work product or other privileged or confidential information.

WHEREFORE the undersigned respectfully move for leave to file the Declaration of Kent M. Williams and unredacted Exhibits A-J thereto under seal, as requested herein, and any and all other relief the Court deems just and proper.

Dated: November 17, 2011

/s/ Kent M. Williams

Kent M. Williams
WILLIAMS LAW FIRM
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Long Lake, MN 55356
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CERTIFICATE OF SERVICE

I hereby certify that I have this day caused an electronic copy of the MOTION TO FILE DECLARATION AND UNREDACTED EXHIBITS UNDER SEAL to be served on all counsel of record via electronic service pursuant to Paragraph 11 of Case Management Order No. 2 by sending a copy to LexisNexis File and Serve for posting and notification to all parties.

Dated: November 17, 2011

/s/ Kent M. Williams
Kent M. Williams, Esq.